

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

BROOKE HENDERSON and JENNIFER)
LUMLEY,)
)
Plaintiffs,)
) Case No. 6:21-cv-03219-MDH
v.)
)
SCHOOL DISTRICT OF SPRINGFIELD R-)
12, ET AL.,)
)
Defendants.)

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs, Brooke Henderson and Jennifer Lumley, respectfully move this Honorable Court pursuant to Fed. R. Civ. P. 56 for summary judgment in their favor (1) declaring that Defendants' equity training during the Fall Semester of 2020 violated Plaintiffs' rights as secured by the First Amendment and was an unconstitutional condition of employment, (2) permanently enjoining Defendants as appropriate, (3) awarding each Plaintiff \$1.00 per day for each day they attended mandatory equity training, and (4) granting Plaintiffs such other legal or equitable relief the Court deems just and appropriate. In support of their motion for summary judgment, Plaintiffs respectfully submit the accompanying supporting suggestions with incorporated statement of uncontested material facts. As set forth more fully therein, there are no material facts in dispute and Plaintiffs are entitled to judgment in their favor as a matter of law.

July 22, 2022.

/s/ B. H. Boucek

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail and/or facsimile. Parties may access the filing through the Court's electronic filing system.

/s/ B. H. Boucek
BRADEN H. BOUCEK